

submitted with the February 2021 DMR

March 12, 2021

US Environmental Protection Agency Region 1
Office of Ecosystem Protection
5 Post Office Square, Suite 100
Boston, MA 02109-3912

**Report of Non-Compliance with NPDES Permit No. MA0001091
Gulf Oil Terminal, Chelsea, MA**

Dear Sir or Madam;

On behalf of Gulf Oil LP (Gulf), AECOM is reporting to the Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) an incident of non-compliance at the Gulf bulk petroleum terminal (the Terminal) located in Chelsea, MA (NPDES Permit No. MA001091). This report is being provided as an attachment to the Terminal's February 2021 DMR as required in Permit Part II.D.1.g.

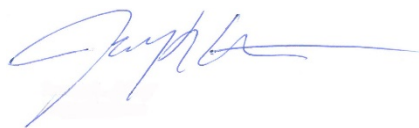
On February 5, 2021 the Terminal conducted a hydrostatic test of a new chiksan arm (a flexible line) on the loading platform at the bulkhead prior to putting the new arm into service. The test water was discharged to the Terminal's stormwater system without conducting the monitoring required in the NPDES Permit. Approximately 256 gallons of municipal water from a fire hydrant was used to hydrostatically test the new chiksan arm. After the test was complete, the hydrostatic test water was discharged to the catchbasin below the loading platform which is pumped to the Tank 117 containment area. The test water then comingled with the stormwater that was in the containment area at the time, which was subsequently discharged through the Terminal's stormwater management system beginning on February 7, 2021.

Although the hydrostatic test water was not sampled before comingling with the stormwater, this discharge did not pose a threat to the environment given the small volume of hydrostatic test water discharged (approximately 256 gallons) compared to the volume of stormwater discharged beginning on February 7, 2021 (811,680 gallons). In addition, the stormwater effluent was sampled on February 7, 2021 for the required monthly parameters (pH, total suspended solids, oil & grease, benzene, naphthalene, and benzo(a)pyrene) and all results were within the Permit Discharge Limits.

Terminal staff have been informed there is no minimum discharge volume for hydrostatic test discharge requirements. Gulf will implement additional training regarding the NPDES Permit requirements specific to hydrostatic test discharges.

If you have questions or require additional information, please contact Christopher Gill, Gulf Oil Director of Environmental, Safety & Occupational Health at 339-933-7049 or Jennifer Atkins of AECOM at 978-905-2101.

Yours sincerely,



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cc: MassDEP, Bureau of Waste Prevention, Northeast Regional Office
A. Adams, Gulf Oil Chelsea
C. Gill, Gulf Oil
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